



## **Certification of CPNI Filing February 2, 2006**

February 2, 2006

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of Secretary  
445 12th Street, SW  
Washington, D.C. 20554

Re: EB-06-TC-060


Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Bryon McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Respectfully submitted,

  
Roger Bales  
General Manager  
Southern Kansas Telephone

Enclosures

cc: Bryon McCoy, Telecommunications Consumers Division

**ANNUAL CERTIFICATION – Customer Proprietary Network Information**

**Procedures of Southern Kansas Telephone Company, Inc.**

I, Kendall S. Mikesell hereby certify that I have personal knowledge that Southern Kansas Telephone Company, Inc. has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Southern Kansas Telephone Company, Inc. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: Kendall S. Mikesell

By: Kendall S. Mikesell, President

Date: February 2, 2006

## **Certification of CPNI Filing February 2, 2006**

### **Southern Kansas Telephone Company, Inc.**

Southern Kansas Telephone Company, Inc., hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Southern Kansas Telephone Company, Inc., uses its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, dependent on use, given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage. Further, on all in-bound calls, customers are given notice that their CPNI may be used and given the opportunity to allow or disallow CPNI usage for the duration of that call.

Southern Kansas Telephone Company, Inc. employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations and the Company's statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Employees may easily determine the CPNI status of individual customers prior to using CPNI. Southern Kansas Telephone Company, Inc. maintains a written log regarding outbound usage of CPNI including a description of the marketing activity, which products and/or services were marketed and the specific CPNI used. All sales and marketing personnel obtain approval from his/her supervisor of any outbound usage of CPNI. Southern Kansas Telephone Company, Inc. currently does not sell, rent or otherwise disclose customers' CPNI to non-affiliated entities. If the Company's affiliates are allowed to access customers' CPNI, then such disclosure is noted in the written log.

In compliance with the Commission's rules, Southern Kansas Telephone Company, Inc. does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.